

## Mullin, Michelle

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**From:** Castrilli, Laura  
**Sent:** Monday, April 13, 2020 10:08 AM  
**To:** Mullin, Michelle  
**Cc:** Ogle, Kimberly  
**Subject:** RE: PCB inspection priorities

Can you replace the first part of the USEI considerations with the following?:

The November 17, 2018 explosion in the Containment Building damaged the PCB Processing Building. During a high wind event on January 21, 2019 a wall and the roof of the damaged PCB Processing Building collapsed. After the undamaged TSCA waste containers were removed and transported off-site, the roof and all walls were pushed into the footprint of the building. USEI covered the debris with tarps to prevent infiltration by rain and then later disposed of the building debris in a RCRA/TSCA landfill cell. The foundation and rivetted steel floor remains in the original location. They are currently not treating or re-packaging PCB waste, but they are direct landfilling PCB waste. They failed to notify the PCB program of their December 28, 2019 RCRA/PCB landfill cell fire due to their interpretation of the wording in the permit/approval. It is possible they are mis-interpreting other parts of the permit/approval and are not in compliance. Prior to the explosion, they were collaborating with the EPA on submission of an updated renewal application for commercial storage and disposal of PCB wastes.

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**From:** Ogle, Kimberly <[Ogle.Kimberly@epa.gov](mailto:Ogle.Kimberly@epa.gov)>  
**Sent:** Thursday, April 09, 2020 4:51 PM  
**To:** Mullin, Michelle <[Mullin.Michelle@epa.gov](mailto:Mullin.Michelle@epa.gov)>; Bartus, Dave <[Bartus.Dave@epa.gov](mailto:Bartus.Dave@epa.gov)>; Feldhahn, Brett <[Feldhahn.Brett@epa.gov](mailto:Feldhahn.Brett@epa.gov)>; Castrilli, Laura <[Castrilli.Laura@epa.gov](mailto:Castrilli.Laura@epa.gov)>; Knittel, Janette <[Knittel.Janette@epa.gov](mailto:Knittel.Janette@epa.gov)>; Davies, Lynne <[Davies.Lynne@epa.gov](mailto:Davies.Lynne@epa.gov)>  
**Subject:** RE: PCB inspection priorities

ENFORCEMENT SENSITIVE---DO NOT RELEASE UNDER FOIA

Hey Michelle: thanks for pulling this list together. I've been involved in many targeting exercises --and as you know there are so many ways to approach this---and things to consider so please take my thoughts with a grain of salt. I've a meeting with ECAD tomorrow to discuss what happens with the results of the inspections...I'll let you know what I hear. I've CC'ed the group so they can see my thought process.....(sorry, it is what it is). I've entered my comments in [blue](#).

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**From:** Mullin, Michelle <[Mullin.Michelle@epa.gov](mailto:Mullin.Michelle@epa.gov)>  
**Sent:** Thursday, April 9, 2020 10:31 AM  
**To:** Bartus, Dave <[Bartus.Dave@epa.gov](mailto:Bartus.Dave@epa.gov)>; Ogle, Kimberly <[Ogle.Kimberly@epa.gov](mailto:Ogle.Kimberly@epa.gov)>; Feldhahn, Brett <[Feldhahn.Brett@epa.gov](mailto:Feldhahn.Brett@epa.gov)>; Castrilli, Laura <[Castrilli.Laura@epa.gov](mailto:Castrilli.Laura@epa.gov)>; Knittel, Janette <[Knittel.Janette@epa.gov](mailto:Knittel.Janette@epa.gov)>; Davies, Lynne <[Davies.Lynne@epa.gov](mailto:Davies.Lynne@epa.gov)>  
**Subject:** PCB inspection priorities  
**Importance:** High

Hello team-

As mentioned at our last team meeting, HQ is hiring a contractor to conduct PCB inspections in Regions 6, 8, and 10. They asked us to list our facilities in order of priority for inspection. They will evaluate these and decide which, if any, should be inspected by them. I have put these in the order I believe are of highest priority. They asked only for commercial facilities, but I included INL due to ongoing waste treatment activities there and repeat incidents. [Please ensure that the contractors have federal credentials---which I assume they do. Also---if we are available we should let staff travel with the contractors if they go to their assigned sites. Please find out if that is acceptable to them so we can plan travel.](#)

Please review this list and ensure that the site location information is correct for your site, and the considerations are accurate. If you have any other feedback, please let me know. I need feedback by COB Monday, April 13.

Thank you,  
Michelle

#### [IF WE WERE TOLD WE ONLY GET ONE---WHAT ONE WOULD YOU RECOMMEND THEN?](#)

##### **Priority: 1**

**Facility name:** Chemical Waste Management of the Northwest

**Location:** 17629 Cedar Springs Lane, Arlington, OR 97812

**PCB Approval Type:** 761.75 & 761.65(d)

**Time since last PCB inspection (if never inspected, write time since it was first permitted):** prior to 2012

**Additional considerations:** This is currently the primary location where all PCB waste in R10 is disposed. They are planning to apply for renewal of their PCB commercial disposal approval. [\(Suggested Language\): We have no current information pertaining to their compliance status nor if the current approval needs revision or renewal. It is a very large facility that handles a very large volume of PCB wastes.](#)

~~We have no idea if they are in compliance with the current approval and could comply with standard conditions in the renewal, or if any new conditions need to be imposed to ensure no unreasonable risk of injury to health or the environment. The volume of PCB waste disposed at this facility warrants particular compliance attention.~~

[Thoughts: Also know---lots of activity is going on here: EPA enforcement; RCRA permit renewals and revisions---I'm not saying this is not a good target---it just means everyone needs to know that going in for the best outcome.](#)

##### **Priority: 2**

**Facility name:** US Ecology

**Location:** Missile Base Road, Grandview ID 83624. Owyhee county near Grand View, Idaho, on Lemley Road, at latitude 43° 03' 056" North and longitude 116° 15' 044" West

**PCB Approval Type:** 761.75 & 761.65(d)

**Time since last PCB inspection (if never inspected, write time since it was first permitted):** prior to 2012

**Additional considerations:** This facility has had an explosion in their PCB storage and treatment building, and a fire in the PCB disposal cell. They are currently not treating or re-packaging PCB waste, but they are direct landfilling PCB waste. They failed to notify the PCB program of their fire due to their interpretation of the wording in the permit/approval. It is possible they are mis-interpreting other parts of the permit/approval and are not in compliance. Their PCB approval is expired. They plan to apply for renewal. We have no [current information pertaining to their compliance status nor if the current approval is adequate or needs revision to ensure no unreasonable risk of injury to health or the environment.](#) ~~idea if they are in compliance with the current approval and could comply with standard conditions in the renewal, or if any new conditions need to be imposed to ensure no unreasonable risk of injury to health or the environment.~~

[Thoughts: Given we may only get one of these---I am ok with not having this one selected. It's based merely on my comfort in IDEQ and Laura ensuring they are doing the root cause analysis.](#)

**Priority:** 3

**Facility name:** Hanford

**Location:**

**PCB Approval Type:** 761.65(d)

**Time since last PCB inspection (if never inspected, write time since it was first permitted):** prior to 2012

**Additional considerations:** In 2013 we were aware that Hanford had shipped many drums with PCB waste to Permafix NW without listing the PCB waste on the manifest. Site visits have also indicated that storage of PCB waste was not in compliance with engineering requirements of 761.65(b). [A full PCB compliance inspection could inform the next PCB approval.](#) ~~It would be good to understand the full scope of PCB compliance issues at this facility prior to issuing a PCB Commercial Storage approval.~~ The facility intends to apply in early 2021.

**Thoughts:** [Good candidate---I'd may be make it tied with #1. Also...not sure Hanford is commercial \(?\)](#)

**Priority:** 4

**Facility name:** Idaho National Laboratory (INL)

**Location:** U.S. Department of Energy Idaho Operations Office, 1955 Freemont Avenue, MS 1216, Idaho Falls, Idaho 83415

**PCB Approval Type:** 761.61(c)

**Time since last PCB inspection (if never inspected, write time since it was first permitted):** prior to 2012

**Additional considerations:** INL is not a commercial facility, but they do process a lot of radioactive waste, some of which is contaminated with PCBs. Because radioactive waste presents a hazard for sampling, INL presumes all containers in their waste stream to contain PCBs at a concentration of 500 ppm or greater and EPA issued risk-based disposal approval to accomplish the processing for disposal activities necessary to meet the WIPP waste acceptance criteria. We are aware of at least two incidents where processing of this waste has resulted in explosion or fire, and it appears that the containers were not labeled as containing PCB waste. Since treatment of the waste is ongoing, and compliance with the approval [has been an issue in the past](#) ~~appears to be an issue~~, an inspection is warranted to understand the full scope of compliance and whether or not the approval needs to be updated with additional conditions to ensure no unreasonable risk of injury to health or the environment.

**Priority:** 5

**Facility name:** PermaFix NW

**Location:**

**PCB Approval Type:** 761.65(d)

**Time since last PCB inspection (if never inspected, write time since it was first permitted):** prior to 2012

**Additional considerations:** PFNW is a commercial radioactive waste management facility that is regulated by an authorized state hazardous waste permit issued by WA Ecology and a PCB commercial storage approval issued by EPA. The contingency plan was implemented December 16, 2019 for a fire in SB-07 of the Mixed Waste Facility. The SB-07 area within the facility does have TSCA approval to store PCB wastes. Permafix is in the process of renewing their RCRA permit and subsequently EPA will issue TSCA approval for commercial storage separately.

**Thoughts:** [it may be that we have this info already. If we do and we've just not gotten to it...perhaps this is better done by us. Given you ranked it as 5<sup>th</sup>....it's likely moot.](#)

Having a better understanding of this incident and the likelihood to be repeated is critical information for EPA to consider during the approval re-issue process.

**Priority:** 6

**Facility name:** Stericycle, formerly Burlington Environmental

**Location:** 20245 77TH AVE SW, Kent WA 98032

**PCB Approval Type:** 761.65(d)

**Time since last PCB inspection (if never inspected, write time since it was first permitted):** Never received a PCB inspection.

**Additional considerations:** This site has Interim Approval; EPA has requested an updated application and expects to issue approval by end of FY2020.

The state RCRA permit doesn't have standards for closure, so we can't rely on it for TSCA approval. We have no information about PCB storage compliance for this facility, and no way of knowing if they can comply with standard conditions in a PCB commercial storage approval, or if any specific conditions need to be imposed to ensure no unreasonable risk of injury to health or the environment.

Thoughts: I raised this with Ecology today on the quarterly. They are updating their closure guidance and we will be discussing this site in detail. Given all the eyes on this---I've pretty confident we will fix this---either thru a new rcra closure plan that address the PCB requirements or we could (if we don't make progress) request a PCB only closure plan. Given this is 6<sup>th</sup>...it may be moot....but it is one we hoped could be completed this year (HQ commitment). Inspecting may postpone that bean....(just musing out loud here).

**Priority:** 7

**Facility name:** Transformer Technologies

**Location:**

**PCB Approval Type:** 761.65(d)

**Time since last PCB inspection (if never inspected, write time since it was first permitted):** Prior to 2012

**Additional considerations:** This facility is applying for renewal of their PCB commercial storage approval. A lack of ~~current compliance information exists. Additional information would help inform inspections--precludes us from understanding the compliance history of this facility with wheather~~ their existing PCB commercial storage approval, or if any specific conditions need to be added to the renewal to ensure no unreasonable risk of injury to health or the environment.

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